

**MEETING WITH THE UK OFFICIALS CONCERNING TRANSITION REVIEW OF
ANTI-DUMPING DUTIES ON CERTAIN CERAMIC TILES ORIGINATING IN THE
PEOPLE'S REPUBLIC OF CHINA**

(TD0027)

GUANGDONG OVERLAND CERAMICS CO., LTD.

(OVERLAND)

4 JULY, 2023

CONTENT

Part I		A brief introduction of Overland
Part II		Request for an individual rate
Part III		No Competition & Economic Interest
Part IV		Overland's Products that should be excluded
Part V		Conclusion & Request

Part I

A brief introduction of Overland

Part I

A brief introduction of Overland

- 1. Histories and Key Figures**
2. The Company's Market Position and Operation Philosophy
3. The Company's exports to the UK

Part I

A brief introduction of Overland

1. Histories and Key Figures
- 2. The Company's Market Position and Operation Philosophy**
3. The Company's exports to the UK

The Company's Market Position and Operation Philosophy

Overland's market position

Overland **only** produces and exports the **porcelain tiles**, which cannot be produced by the UK industry.

Overland now is one of eight Chinese brands to participate the CERAIE in Bologna, Italy, presenting the world an image of a top Chinese producer in field of **porcelain tiles**.

Overland has been certificated by different international organization, and got various certification to be able to sell to different countries. Overland managers already made several trips to the UK to explore the market, as its products and the UK products complement each other; they are not interchangeable, and therefore do not compete with each other.

The Company's Market Position and Operation Philosophy

Overland's Operation Philosophy

- Overland is dedicated to producing genuine porcelain tiles **with a water absorption rate of less than 0.1%**. We are committed to **developing innovative products** that authentically capture the essence of nature's beauty, such as stone and marble, in terms of visual appeal, tactile experience, and overall installation effects.
- Our business revolves around producing **high-end and elegant products** with utmost sophistication, catering to the discerning taste of our customers.
- Overland's core philosophy dictates that we never compromise on the quality of our products or cater to the low-end market solely for the sake of sales volume.

Part I

A brief introduction of Overland

1. Histories and Key Figures
2. The Company's Market Position and Operation Philosophy
3. **The Company's exports to the UK**

The Company's exports to the UK

During the POI, Overland exported to the UK:

[redacted- business
data]

[redacted- business
data]

[redacted- business
data]

[redacted- business
data]

Part II

Request for an individual rate

Part II

Request for an individual rate

- 1. Legal Background of the plea**
2. Overland has fully cooperated in the proceeding

Legal Background of the plea

Legal

E.g., Article 99A of the Trade Remedies (EU Exit) Regulations 2019

Conduct of transition review

99A.—^{F45}(1) In a transition review, the TRA must consider whether—

- (a) the dumping of the goods or the importation of the subsidised goods subject to review would be likely to continue or recur if the anti-dumping amount or countervailing amount were no longer applied to those goods; and
- (b) injury to a UK industry in the goods would be likely to continue or recur if the anti-dumping or countervailing amount were no longer applied to those goods.】

(2) The TRA may also—

- (a) consider—
 - (i) whether it is appropriate to recalculate the anti-dumping amount or the countervailing amount;
 - (ii) whether the goods or the description of the goods to which the anti-dumping amount or the countervailing amount applies should be varied;
 - (iii) any of the matters of a review conducted under Chapter 2 of Part 7;
- (b) reassess—
 - (i) the margin of dumping or the amount of the subsidy;
 - (ii) in accordance with Part 5, the anti-dumping amount or the countervailing amount adequate to remove the injury to a UK industry in the relevant goods caused by the dumped goods or the subsidised imports.

(3) For the purposes of conducting a transition review under regulation 97(2)(a)—

- (a) an EU anti-dumping duty is to be treated as an anti-dumping amount;
- (b) an EU countervailing duty is to be treated as a countervailing amount.

Legal Background of the plea

Legal (continued)

E.g., WTO Anti-dumping Agreement (ADA)

6.10 The authorities shall, **as a rule, determine an individual margin of dumping for each known exporter or producer** concerned of the product under investigation. In cases where the number of exporters, producers, importers or types of products involved is so large as to make such a determination impracticable, the authorities may limit their examination either to a reasonable number of interested parties or products by using samples which are statistically valid on the basis of information available to the authorities at the time of the selection, or to the largest percentage of the volume of the exports from the country in question which can reasonably be investigated.

Part II

Request for an individual rate

1. Background of the plea
2. **Overland has fully cooperated in the proceeding**

Overland has fully cooperated in the proceeding

Facts

This Transition Review relates to an AD measure adopted over 12 years ago by the European Union (EU), to which the UK is a member until 2020. Subsequent to Brexit, the EU antidumping measure was maintained but the Authority promised to conduct a transition review to determine if the measure should be maintained, **varied** or revoked in the UK.

Overland **fully participated and cooperated** in the Transition Review, duly submitted **Pre-Sampling Questionnaire** (October 7, 2022), the **exporter's questionnaire response** (February 6, 2023) and the **response to the TRA's deficiency letter** (April 14, 2023).

No verification is carried out on Overland's questionnaire responses by far.

The Company filed **a request for variation** of antidumping duty on 22 May 2023.

Part III

No Competition & Economic Interest

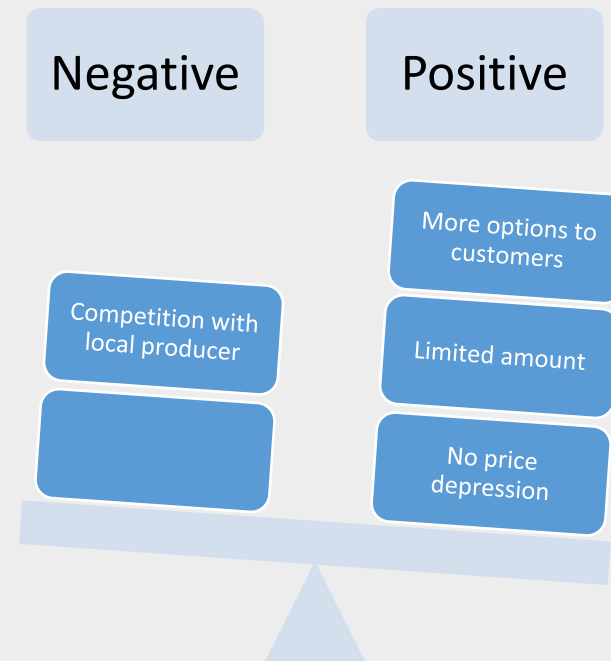
Products of Overland will not compete with the ones of local industry

Generally speaking, if the absorption rate is below **0.5%**, it can be considered porcelain tile, while the absorption rate of porcelain tiles produced by Guangdong Overland is below **0.1%**.

The UK industry is not able to produce porcelain tiles, even tiles with an absorption rate below 5%. There is no competition between Guangdong Overland's products and local products, on the contrast, Guangdong Overland's porcelain tiles and the UK industry's ceramic tiles are **complementary**.

Products of Guangdong Overland will not negatively impact the interests local industry

Products of Guangdong Overland did not have negative impact the interests of the UK ceramic tile producers, but supplement the shortage of the market demand, in terms of product diversity and variety.



Part IV

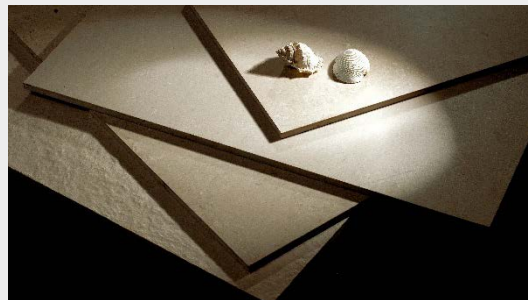
Guangdong Overland's Products that should be excluded

Comments on Product Scope

Exclusion of Certain Products from the Product Scope

Reasons for Exclusion:

1. The UK industry is **not able to produce Porcelain tiles;**
2. Porcelain tiles cannot be substituted by other types of tiles that the UK industry currently produces, thus having **no like products;**
3. **Also request to exclude: Porcelain slabs and other types which is not produced or although produced but not meet the market demand.**



Product Type: Porcelain Tiles (with water absorption < 0.5%) – “PT”

Non-substitutability

Strength

PT can stand heavy duty, being unbreakable and wear resistant.

Frost Resistance

PT are resistant to freezing and thawing, and thus can be used for outdoor tiles that won't freeze and break during winter.

Cost Efficiency

PT can substitute a lot of existing types of tiles (but may cause much higher cost), while other existing types in the UK cannot substitute PT.

Comments on Product Scope

Exclusion of Certain Products from the Product Scope

Also request to exclude: **porcelain slabs and other types which is not produced or although produced but not meet the market demand.**



Comments on Product Scope

Complementarity of Chinese Imports

Chinese imports would **complement** UK production in certain types of ceramic tiles that satisfies the diversity of market demand, and eventually **benefits UK consumers**.



Part V

Conclusion & Requests

Conclusion & Request

Conclusion & Request

Summary of Arguments:

- Individual Rate shall be granted to Guangdong Overland;
- The varied duty rate shall be based on Guangdong Overland's own data;
- Guangdong Overland will continue its fully cooperation with the investigation Authority.

Other Request:

- If TRA determined to still impose anti-dumping duty on imports from China, including products from Guangdong Overland, the Company requests the Authority to exclude porcelain tiles and slabs from the scope of product.

Thank You!
